



August 12, 2009

L-MT-09-072
10 CFR 50.90

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket 50-263
Renewed Facility Operating License
License No. DPR-22

Monticello Extended Power Uprate: Response to NRC Fire Protection Branch (AFPB)
Review Item dated July 2, 2009, Regarding the Preparation of the Draft Safety
Evaluation (TAC MD9990)

- References:
1. NSPM letter to NRC, License Amendment Request: Extended Power Uprate (L-MT-08-052) dated November 5, 2008, Accession No. ML083230111
 2. Email P. Tam (NRC) to G. Salamon and K. Pointer (NSPM) dated March 12, 2009, "Monticello - Draft RAI from Fire Protection Branch re. Proposed EPU Amendment" (TAC No. MD9990) Accession No. ML090720057
 3. NSPM letter to NRC, (L-MT-09-026), "Monticello Extended Power Uprate: Response to NRC Instrumentation & Controls Branch Request for Additional Information (RAI) dated March 11, 2009 and Fire Protection Branch RAIs dated March 12, 2009 TAC No. MD9990" dated May 13, 2009, Accession No. ML091410117
 4. Email P. Tam (NRC) to K. Pointer, L. Gunderson, G. Salamon (NSPM) dated July 2, 2009, "Monticello Extended Power Uprate – An Open Issue in the Draft SE re. Fire Protection (TAC MD9990)" Accession No. 0918311240

Pursuant to 10 CFR 50.90, the Northern States Power Company, a Minnesota corporation (NSPM), requested in Reference 1 an amendment to the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License (OL) and Technical Specifications (TS) to increase the maximum authorized power level from 1775 megawatts thermal (MWt) to 2004 MWt.

On March 12, 2009, the AFPB provided four RAIs in Reference 2 based on a review of Reference 1. In Reference 3, NSPM responded to these RAIs. In the preparation of a Fire Protection safety evaluation for the EPU LAR the AFPB noted an open issue communicated in Reference 4. NSPM and the AFPB discussed the open issue in a teleconference on July 6, 2009. Based on this discussion, NSPM revised its response to AFPB RAI No. 3 which was initially submitted in NSPM letter L-MT-09-026, Enclosure 2.

Enclosure 1 to this letter provides NSPM's revised response to AFPB RAI No. 3 dated March 12, 2009. The revised response replaces the L-MT-09-026, Enclosure 2, RAI No. 3 response in its entirety.

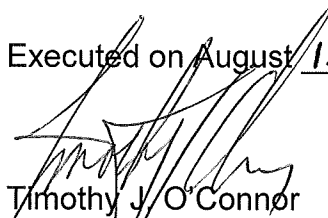
In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated Minnesota Official.

Summary of Commitments

This letter makes no new commitments and does not change any existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2009.



Timothy J. O'Connor
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company - Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC
Minnesota Department of Commerce

ENCLOSURE 1

MONTICELLO NUCLEAR GENERATING PLANT

**NSPM REVISED RESPONSE TO AFPB RAI No. 3
DATED MARCH 12, 2009**

AFPB REVIEW ITEM – RAI No. 3

In RAI # 3, the staff noted that Enclosure 5 to L-MT-08-052, Section 2.5.1.4, "Fire Protection," states that the Appendix R fire event was analyzed for the two cases at EPU conditions. The licensee stated that the operator actions required to mitigate the consequences of a fire are not affected nor is there a need for any new operator actions. The staff requested the licensee to verify that additional heat in the plant environment from the EPU will not (1) interfere with required operator manual actions being performed at their designated time, or (2) require any new operator actions. By letter dated May 13, 2009, the licensee provided following response.

The licensee indicated that there are no new operator actions required as a result of the proposed EPU to mitigate the Appendix R fire event, and the existing assumptions for the timing of the required operator actions during an Appendix R event were not changed for EPU. Further, the licensee stated that the governing procedure for operator actions during an Appendix R event is Abnormal Operating Procedure C.4-C, "Shutdown Outside of the Control Room." The remote shutdown is accomplished at Alternate Shutdown System (ASDS) Panel C-292 on the third floor of the EFT Building, which is accessed via the Plant Administration Building. The operator actions to place the reactor in a cold shutdown condition are performed at this panel. The EPU does not present conditions that interfere with or change the operator actions necessary to achieve cold shutdown for the Appendix R event.

The licensee's response partially addresses the staff's concerns. For the EPU condition, the licensee updated the fire safe-shutdown analysis. The licensee identified that the proposed EPU does not present conditions that interfere with or change the operator actions necessary to achieve cold shutdown for the Appendix R event. The staff noted that, the licensee did not identify conditions that interfere with or change the operator actions necessary to achieve and maintain hot shutdown for the Appendix R event. Based on its review, the licensee's response to RAI # 3 partially acceptable.

NSPM REVISED RESPONSE TO AFPB RAI No. 3

The governing procedure for operator actions during an Appendix R event is Abnormal Operating Procedure C.4-C, "Shutdown Outside of the Control Room." The remote shutdown is accomplished at Alternate Shutdown System (ASDS) Panel C-292 on the third floor of the EFT Building, which is accessed via the Plant Administration Building. The operator actions to maintain hot shutdown and then place the reactor in a cold shutdown condition are performed at this panel. EPU does not present conditions that interfere with or change the operator actions necessary to achieve hot or cold shutdown for the design basis Appendix R event.

The Appendix R procedure includes a step to implement Procedure C.4-B.08.07.A (Ventilation System Failure) as appropriate to provide ventilation to Division II vital electrical spaces. The ventilation procedure includes steps to monitor plant areas in the

event ventilation is lost and open doors or use pre-positioned fans if necessary. The need for these compensatory actions depends upon whether hotter than normal outside air temperatures exist. EPU has no effect on implementing this contingency procedure or the execution of the compensatory actions.